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Attorneys for Defendant  
LOCAL INITIATIVE HEALTH  
AUTHORITY FOR LOS ANGELES  
COUNTY, operating and doing business  
as L.A. CARE HEALTH PLAN

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

DORIS GOMEZ,

Plaintiff

v.

L.A. CARE HEALTH PLAN, and DOES  
1-10, Inclusive,

Defendants.

CASE NO.:

JUDGE:

NOTICE OF REMOVAL OF  
ACTION UNDER 28 U.S.C.  
§1441(A) (FEDERAL QUESTION)

TO THE CLERK OF THE ABOVE-ENTITLED COURT

PLEASE TAKE NOTICE that Defendant Local Initiative Health Authority for Los Angeles County, operating and doing business as L.A. Care Health Plan (hereinafter "L.A. Care"), erroneously named and served as L.A. Care Health Plan hereby removes to this Court the state court action described below.

1. On April 30, 2015, an action was commenced in the Superior Court of the State of California in the city of Long Beach, County of Los Angeles, entitled *Doris Gomez, Plaintiff v. L.A. Care Health Plan*, et al. as case number NC060051, (herein the "Complaint"). The Complaint is attached hereto as Exhibit "A."

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2. The first date upon which defendant L.A. Care received a copy of the Complaint was May 28, 2015 when L.A. Care was served with a copy of the Complaint and a summons from the said state court. A copy of the summons is attached hereto as Exhibit "B".

3. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. §1331 and is one which may be removed to this Court by Defendant pursuant to the provisions of 28 U.S.C. §1441(a) in that the sixth cause of action asserts a claim under the Family Medical Leave Act, 29 U.S.C. §2601, et. seq.

4. No other defendant has been named in the Complaint and served with the summons and complaint.

5. L.A. Care will give written notice of the filing of this Notice of Removal to Plaintiff and will file a copy of this Notice of Removal with the Superior Court of the State of California for the County of Los Angeles, as required by 28 U.S.C. § 1446(d).

6. Payment of the appropriate fees and costs for removal and docketing of this matter in federal court, if any, are tendered with this Notice.

DATED: June 16, 2015

ALVARADOSMITH  
A Professional Corporation

By: /s/ Mary Michelena Monroe

THEODORE E. BACON  
MARY MICHELENA MONROE  
Attorneys for Defendant  
LOCAL INITIATIVE HEALTH AUTHORITY  
FOR LOS ANGELES COUNTY, operating and  
doing business as L.A. CARE HEALTH PLAN

**CERTIFICATE OF SERVICE****STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is ALVARADOSMITH, 633 W. Fifth Street, Suite 1100, Los Angeles, CA 90071.

On **June 18, 2015**, I served the foregoing document(s) described as: **NOTICE OF REMOVAL OF ACTION UNDER 28 U.S.C. §1441(A) (FEDERAL QUESTION)** on the interested parties in this action.

☒ by placing the original and/or a true copy thereof enclosed in (a) sealed envelope(s), addressed as follows:

Todd M. Friedman, Esq.  
Suren N. Weerasuriya, Esq.  
LAW OFFICES OF TODD M. FRIEDMAN  
324 S. Beverly Drive #725  
Beverly Hills, CA 90212  
T: (877) 206-4741  
F: (866) 633-0228

☒ **BY REGULAR MAIL:** I deposited such envelope in the mail at 633 W. Fifth Street, Los Angeles, California 90071. The envelope was mailed with postage thereon fully prepaid. I am "readily familiar" with this firm's practice of collecting and processing correspondence for mailing. It is deposited with U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing in affidavit.

☐ **BY FACSIMILE MACHINE:** I Tele-Faxed a copy of the original document to the above facsimile numbers.

☐ **BY OVERNIGHT MAIL:** By placing the document listed above in a sealed envelope and affixing a pre-paid air bill, and causing the envelope to be delivered to a Federal Express and/or Golden State Overnight ("GSO") agent for delivery.

☐ **BY ELECTRONIC MAIL:** I served the foregoing document by electronic mail to the email address(es) listed on the service list.

☐ **BY PERSONAL SERVICE:** I *caused to be personally served*, by delivery of a copy of the document(s) listed above, placed in an envelope with the name and address of the person(s) being served, and having First Legal Network, 1517 W. Beverly Blvd., Los Angeles, CA 90026, leave the documents with a receptionist or person in charge of the recipients' offices.

☒ (Federal) I declare that I am employed in the office of a member of the Bar of this Court, at whose direction the service was made.

Executed on **June 18, 2015**, at Los Angeles, California.

  
Belinda Slack

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